

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

VLSI TECHNOLOGY LLC,

Case No. 5:17-CV-05671-BLF

Plaintiff,

V

INTEL CORP..

**[PROPOSED] ORDER GRANTING VLSI  
TECHNOLOGY LLC'S LETTER BRIEF  
(Dkt. 370)**

**Defendant.**

Judge: Hon. Beth Labson Freeman  
Magistrate Judge: Hon. Nathanael Cousins

Having considered the discovery dispute motion filed by the parties, and for the reasons stated on the record, the Court grants the relief sought by VLSI Technology LLC in its Letter Brief (Dkt. 370).

IT IS HEREBY ORDERED THAT, within 30 days:

1. With respect to Fox2, THAT:

a. Intel will produce all remaining binaries, models, configuration files, and any other remaining file required to enable Fox2 to operate on VLSI's standalone machines for the following products:

i. **Client products**

1. Alder Lake:

[REDACTED]  
[REDACTED]

2. Broadwell Client:

[REDACTED]

3. Cannon Lake Client:

[REDACTED]

4. Comet Lake:

[REDACTED]

5. Haswell Client:

[REDACTED]

6. Ice Lake Client:

[REDACTED]

7. Lakefield:

[REDACTED]

[REDACTED]

8. Tiger Lake Client:

[REDACTED]

[REDACTED]

ii. **Server products**

1. Broadwell server:

[REDACTED]

2. Cascade Lake Server:

[REDACTED]

3. Cooper Lake Server:

[REDACTED]

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1           4. Haswell Server:

2           [REDACTED]  
3           [REDACTED]

4           5. Ice Lake Server:

5           [REDACTED]  
6           [REDACTED]  
7           [REDACTED]  
8           [REDACTED]  
9           [REDACTED]  
10          [REDACTED]  
11          [REDACTED]  
12          [REDACTED]  
13          [REDACTED]  
14          [REDACTED]  
15          [REDACTED]  
16          [REDACTED]

17          6. Skylake Server: [REDACTED]

- 18          2. Intel will produce [REDACTED], to run on  
19            VLSI's standalone machines;  
20          3. Intel will produce the files to run [REDACTED] on VLSI's standalone machines; and  
21          4. Intel will produce the files to run [REDACTED] on VLSI's standalone machines.

22  
23 IT IS FURTHER ORDERED, THAT:

- 24          5. Intel is precluded from criticizing the accuracy of the tools that VLSI used in lieu of  
25            Intel's production to quantify and measure the benefits of each Patent;  
26          6. Intel is precluded from criticizing VLSI's experts or witnesses with respect to testing  
27            that has been done or could have been done using Fox2 on the following products:  
28              i. Alder Lake;

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- 1                   ii. Broadwell Client; Broadwell server;
- 2                   iii. Cannon Lake Client;
- 3                   iv. Cascade Lake Server;
- 4                   v. Comet Lake;
- 5                   vi. Cooper Lake Server;
- 6                   vii. Haswell Client; Haswell Server;
- 7                   viii. Ice Lake Client; Ice Lake Server;
- 8                   ix. Lakefield Client;
- 9                   x. Tiger Lake Client;
- 10                  xi. Skylake Server.

11                  7. Intel is precluded from referring to [REDACTED]

12                  with respect to any of the Accused Products. This includes, but is not limited to,

- 13                  a. [REDACTED]  
14                  [REDACTED]  
15                  [REDACTED], including features accused under the '806 and '836 Patents;
- 16                  b. Any data that [REDACTED]  
17                  [REDACTED], including for features accused under the '806 Patent;
- 18                  c. Intel's reliance on any [REDACTED]  
19                  [REDACTED], including analysis on features accused under the '014  
20                  Patent;
- 21                  d. Reference to the [REDACTED]  
22                  [REDACTED]  
23                  [REDACTED] of the Accused Products.

24                  8. Intel is precluded from criticizing VLSI's experts or witnesses on the basis that VLSI  
25                  did not use an Intel-specific [REDACTED] to inform its quantification  
26                  of the power benefits of the Asserted Patents, including the '806, '922, and '014 Patents;  
27                  and

28                  9. Intel is precluded from criticizing VLSI's experts or witnesses on the basis that VLSI

1 did not use an Intel-specific [REDACTED] to inform its quantification  
2 of the power benefits of the Asserted Patents, including the '207, '922 and '806 Patents.  
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**IT IS SO ORDERED.**

5 Date:

6 By: \_\_\_\_\_  
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